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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 11

**NOTICE OF CHAPTER 11
TRUSTEE'S MOTION FOR ORDER
SHORTENING TIME ON MOTION
FOR ORDER APPROVING SALE
OF EQUIPMENT FREE AND
CLEAR OF ALL LIENS, CLAIMS
AND INTERESTS, APPROVING
NOTICE THEREOF AND
RELATED RELIEF**

Telephonic Hearing

Date: April 9, 2020

Time: 10:30 a.m. PT

Telephone: 877-402-9753

Access Code: 3001392

PLEASE TAKE NOTICE THAT Mark D. Waldron, in his official
capacity as the Chapter 11 Trustee (the “**Trustee**”), has moved (the “**Motion**”) the
Court pursuant to 11 U.S.C. § 105, Rule 9006 of the Federal Rules of Bankruptcy

1 Procedure and Rule 2002-1 of the Local Bankruptcy Rules of the above-captioned
2 Court for an Order allowing the *Chapter 11 Trustee's Motion for Order*
3 *Approving Sale of Equipment Free and Clear of All Liens, Claims and Interests,*
4 *Approving Notice Thereof and Related Relief* (the "**Sale Motion**") [ECF 519] to
5 be heard on seven (7) days' notice, without three (3) additional days for mailing –
6 such that notice of the Sale Motion will be served by ECF and First Class U.S.
7 Mail on or before April 2, 2020 and the hearing will be heard on April 9, 2020 at
8 2:30 p.m. Objections to the Sale Motion to be served and filed by April 8, 2020.

9 Shortened time on the Sale Motion is necessary. Separately, the Court
10 ordered the Trustee to remove equipment from a site that the above-captioned
11 debtor had leased known as the Pangborn Site. The deadline is May 7, 2020. If the
12 Trustee fails to timely clear the Pangborn Site, then any property remaining on the
13 Pangborn Site will be deemed abandoned. Pursuant to the proposed sale, the buyer
14 will pick up and remove the purchased equipment from the Pangborn Site within
15 that deadline. Shortened notice is required to allow the purchaser sufficient time to
16 remove the equipment from the Pangborn Site within the deadline set forth in the
17 Abandonment Order.

18 You may object to this request for shortened time. Objections will be
19 considered by the court at the time of hearing on the Sale Motion.

20 Dated: April 1, 2020

POTOMAC LAW GROUP PLLC

21 By: /s/ Pamela M. Egan
22 Pamela M. Egan (WSBA No. 54736)

23 *Attorneys for Mark D. Waldron, Chapter 11*
24 *Trustee*